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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:	)	
<b>Jay Paul Drummond, et al.</b>	)	
	)	
Serial No.: 09/193,646	)	Art Unit 3621
	)	
Confirm. No.: 2283	)	
	)	
Filed: November 17, 1998	)	Patent Examiner
	)	Calvin Loyd Hewitt II
	)	
Title: Automated Banking Machine	)	
Apparatus and System	)	

Board of Patent Appeals and Interferences  
Commissioner for Patents  
Washington, D.C. 20231

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AND INTERFERENCES

**BRIEF OF APPELLANTS PURSUANT TO 37 C.F.R. § 1.192**

Sir:

The Appellants hereby submit their Appeal Brief pursuant to 37 C.F.R. § 1.192, in triplicate, concerning the above-referenced Application.

## **REAL PARTY IN INTEREST**

The Assignee of all right, title and interest to the above-referenced Application is Diebold, Incorporated, an Ohio corporation.

## **RELATED APPEALS AND INTERFERENCES**

Appellants believe that there are no related appeals or interferences pertaining to this matter.

## **STATUS OF CLAIMS**

Claims 1-33 are pending in the Application.

Claims 1-22 and 33 were rejected under 35 U.S.C. § 103(a) in view of Zeanah et al. (U.S. Patent 5,933,816) (hereinafter "Zeanah").

Claims 23-32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zeanah in view of Wynn et al. (U.S. Patent 5,859,419) (hereinafter "Wynn").

These rejections were the only rejections present in the Office Action ("Action") dated May 15, 2002. Appellants appeal the rejection of claims 1 through 33, inclusive.

## **STATUS OF AMENDMENTS**

No final rejection has been made. However, claims have been twice rejected. Therefore, no amendments to the claims were requested to be admitted after a final rejection.

## **SUMMARY OF INVENTION**

### **Overview of the Invention**

An exemplary embodiment of the present invention is directed to an apparatus including an Automated Teller Machine (ATM) (12). The ATM includes a computer (34) in operative connection with an input device (e.g., 30 or 40) and a currency sheet dispenser (42). Software is executable in the computer. The software includes a browser (76).

In the exemplary embodiment the ATM includes software objects executable in the computer, such as JAVA applets, which correspond to transaction function devices of the ATM (Specification page 16, line 16 to page 17, line 11). For example, a first object may be operative to control an input device; a second object may be operative to control the currency dispenser; and a third object may be operative to access data in a transaction data object and to cause a printer to print data corresponding to data stored in the transaction data object. Each of the first, second, and third objects is operative responsive to one or more transaction device instructions accessed by the computer from one or more HTTP addresses of a server. For example, the first object may be operative to control the input device responsive to first transaction device instructions accessed by the computer from a first HTTP address. The second object may be operative to control the currency dispenser responsive to second HTTP instructions accessed by the computer from a second HTTP address.

The transaction data object (104) is able to hold or record ATM transaction data which may be accumulated as a transaction proceeds (Specification page 25, line 16 to page 26, line 12). The transaction data object may be stored in a memory as data in an object in software. The

transaction data in the transaction data object includes sharable transaction data accessible in a number of different transaction operations. For example, the ATM may acquire data pertinent to a transaction, such as inputs relating to a customer's PIN number and amounts, and include this data among the transaction data. The ability to use and share the data in a number of different operations avoids the need to derive it or obtain it from a customer more than once in the course of a user session involving a number of transaction steps. The transaction data object is also operative to store therein data representative of the dispense of currency by the dispenser. The transaction data object may be used to produce an appropriate record at the end of an ATM transaction session.

Thus, in the exemplary embodiment the ATM computer is adapted to operate responsive to at least one received mark up language document to cause currency to be dispensed from the ATM; access the transaction data in the transaction data object in conducting the transaction; and store in the transaction data object data representative of the dispense of the currency.

## **CONCISE STATEMENT OF THE ISSUES PRESENTED FOR REVIEW**

The questions presented in this appeal are:

- 1). Whether Appellants' claims 1-22 and 33 are unpatentable under 35 U.S.C. § 103(a) over Zeanah.
- 2). Whether Appellants' claims 23-32 are unpatentable under 35 U.S.C. § 103(a) over Zeanah in view of Wynn.

## GROUPING OF CLAIMS

No groups of claims stand or fall together. Every claim recites additional features of the invention which distinguishes the claim over every other pending claim.

Each of Appellants' claims recites at least one element, combination of elements, or step not found or suggested in the applied references, which patentably distinguishes the claims.

The pending claims include five independent claims (claims 1, 11, 18, 30, and 33). Claims 2-10 and 27-29 depend from claim 1. Claims 12-17 and 23-26 depend from claim 11. Claims 19-22 depend from claim 18. Claims 31-32 depend from claim 30. All pending claims 1-33 are reproduced in the Appendix.

## ARGUMENT

### The Applicable Legal Standards

Before a claim may be rejected on the basis of obviousness pursuant to 35 U.S.C. § 103, the Patent Office bears the burden of establishing that all the recited features of the claim are known in the prior art. This is known as *prima facie* obviousness. To establish *prima facie* obviousness, it must be shown that all the elements and relationships recited in the claim are known in the prior art. If the Office does not produce a *prima facie* case, then the Appellants are under no obligation to submit evidence of nonobviousness. MPEP § 2142.

The teaching, suggestion, or motivation to combine the features in prior art references must be clearly and particularly identified in such prior art to support a rejection on the basis of

obviousness. It is not sufficient to offer a broad range of sources and make conclusory statements. *In re Dembiczak*, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

Even if all of the features recited in the claim are known in the prior art, it is still not proper to reject a claim on the basis of obviousness unless there is a specific teaching, suggestion, or motivation in the prior art to produce the claimed combination. *Panduit Corp. v. Denison Mfg. Co.*, 810 F.2d 1561, 1568, 1 USPQ2d 1593 (Fed. Cir. 1987). *In re Newell*, 891 F.2d 899, 901, 902, 13 USPQ2d 1248, 1250 (Fed. Cir. 1989).

The evidence of record must teach or suggest the recited features. An assertion of basic knowledge and common sense not based on any evidence in the record lacks substantial evidence support. *In re Zurko*, 258 F.3d 1379, 59 USPQ2d 1693 (Fed. Cir. 2001).

It is respectfully submitted that the Action from which this appeal is taken does not meet these burdens.

### **The Zeanah Reference**

Zeanah is directed to a system and method for delivering financial services. The disclosure of Zeanah (both the patent and the provisional application) is incomprehensible due to lack of details concerning operation of the system. Due to Zeanah's lack of a disclosed operation, Appellants have been required to speculate as to how the Zeanah system could be made to operate. Therefore, the description of Zeanah herein or any comments directed thereto shall not be construed as agreement or an admission by Appellants that the Zeanah system is capable of operation or of achieving any of the functions carried out by Appellants' system.

Zeanah is directed to a delivery system (12). A system (10) appears to enable a financial institution (e.g., a bank) to deliver services to a plurality of remote devices (14, 16, 18, 20, 24) using the delivery system (12). The delivery system (12) appears to be able to provide interfaces between the bank's internal computer system and staff terminals, ATMs, and a customer's personal computer to enable home banking (col. 29, lines 22-34).

Zeanah's remote devices are remote from the delivery system (12) (Figure 1). Zeanah requires that all of the remote devices (including ATMs) communicate directly through the delivery system (12) in order to provide services to the remote devices (Figure 1; col. 3, lines 63-67; col. 4, lines 54-56; col. 5, lines 44-60; col. 29, lines 20-35). In other words, all data to and from a remote device is through the delivery system (12). The remote devices apparently merely pass along input data to the delivery system (12) which then performs services on behalf of the remote devices.

### **The Wynn Reference**

Wynn is directed to a financial data system. The system includes a card for compiling and storing financial transaction records pertaining to plural financial accounts. A card reader (202) communicates with a central data system (210). The card reader can accept a user PIN by keypad then send the PIN number to the card for verification (col. 6, lines 4-12). The card reader also enables a user, using the same keypad, to select one of the accounts to make a purchase (col. 6, lines 12-23). The ability of the card to store financial transaction records related to multiple

accounts from different financial institutions, and reduce the number of cards a user has to carry, represents an advantage over prior art cards (col. 5, lines 6-14).

**(iv) 35 U.S.C. § 103**

Appellants' remarks concerning the claim rejections in no way waive their rights to have the rejections relying on the Zeanah reference stricken for the reasons presented herein.

**Zeanah Does Not Constitute Prior Art**

**Zeanah is not entitled to the provisional application filing date of October 31, 1996**

Zeanah's provisional application does not comply with the first paragraph of 35 U.S.C. § 112. Therefore, the Zeanah patent is only entitled to the nonprovisional application filing date of August 7, 1997. The present invention claims the benefit of the November 27, 1996 filing date of provisional application 60/031,956. Thus, Zeanah does not constitute prior art against Appellants' invention.

Zeanah apparently claims priority to provisional application 60/029,209 filed October 31, 1996 (copy enclosed). However, a provisional application is required to comply with the first paragraph of 35 U.S.C. § 112. Note 35 U.S.C. § 111; 37 C.F.R. § 1.51; and MPEP § 601.

It is respectfully submitted that the provisional application of Zeanah does not meet the requirements of the first paragraph of 35 U.S.C. § 112. Zeanah's provisional application does not contain sufficient information to enable one skilled in the art on October 31, 1996 to make or use



an operable system without undue experimentation. Thus, the specification of the Zeanah provisional application is not enabling. Therefore, the Zeanah patent is not entitled to the October 31, 1996 filing date of the provisional application, and at best is entitled to the August 7, 1997 filing date of the nonprovisional application.

The First Paragraph of 35 U.S.C. § 112 Requirement

"The specification shall contain a written description of the invention, and of the manner and process of making and using it, in such full, clear, concise, and exact terms as to enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the same, and shall set forth the best mode contemplated by the inventor of carrying out his invention."

The Undue Experimentation Factors

MPEP § 2164.01(a) lists factors to be considered when determining a lack of enablement requirement:

- (A) The breadth of the claims.
- (B) The nature of the invention.
- (C) The state of the prior art.
- (D) The level of one of ordinary skill in the art.
- (E) The level of predictability in the art.
- (F) The amount of direction provided by the inventor.
- (G) The existence of working examples.

(H) The quantity of experimentation needed to make or use the invention based on the content of the disclosure.

Based on the evidence regarding each of the above factors, Zeanah's provisional application would not have taught one skilled in the art, at the date of filing, how to make and use the full scope of any invention without undue experimentation.

As can be seen, the Zeanah provisional application comprises a combination of three separate documents: first document (pages 1-9); second document (pages i to A-5); and third document (section numbered pages 1-47).

The first document (pages 1-9) is a requirements document of what the inventors would like to do, but lacks any presentation of knowledge of how to do it. This document merely provides proposed requirements for an alleged conceptual system. An example of the proposed requirements may be found in section 2.2 (pages 4- 5) which states "1. A user should be"; "2. There should be a mechanism"; "3. The architecture should support"; "4. The architecture should support"; "5. The architecture should support"; and "6. The architecture should support".

Note that the Zeanah provisional application language does not state that "a user is able"; "there is a mechanism"; or that "the architecture does support". Also, the first document lacks any description of the specific details necessary for a reproducible operable embodiment. The first document does not appear to be of any inventive value.

Even if it were somehow possible for one skilled in the art to have ascertained the "requirements", the inventive step (which lies in reducing to practice a working relationship of

structure to enable practice of the desired system, i.e., an enabling system) would still be lacking. Thus, the first document does not provide an enabling system.

The second document of the Zeanah provisional application (pages i to A-5) is an architecture section which lacks the technology and explanations corresponding therewith of how to practice the system. The second document itself admits (page 1-1) that "The primary focus of this document is the conceptual application architecture" and that "following the adaption of this conceptual architecture, the next level of design work will take place fleshing out the details." Section A.7 (pages A-4 and A-5) begins the "hypothetical examples that must assume some implementation details which will change when the detailed application framework design is done." That is, the provisional application reveals that after the alleged concept was completed (which it was not), then the next work (which hadn't even started yet) would involve figuring out the details (the guts of any inventive subject matter) necessary in order to implement the asserted concept. Clearly one skilled in the art would not have been able to make and use the deficient incomplete concept (i.e., the alleged "invention") disclosed in the Zeanah provisional application without undue experimentation. Thus, the second document does not provide an enabling system.

The third document of the Zeanah provisional application (section numbered pages 1-47) comprises presentation overheads which again are evidence that the disclosure was merely a theoretical idea without any enablement or reduction to practice. Page 2 of the third section lists the five (5) process steps needed to reduce to practice the asserted conceptual idea. However, a close reading of the provisional application reveals that only step one (basic theoretical idea) was

ever begun. Page 47 is evidence that steps two through four were yet to begin. Page 47, in concluding the provisional application, admits that the necessary "next steps" of obtaining an architecture, selecting the proper tools, defining an implementation strategy, staffing a design team, and starting the detailed design were not yet completed (or begun). That is, steps two through four were not completed (or even begun) as of the filing date of October 31, 1996. Also, it should be noted that step four (page 2) admits that the "how", which is an integral component of enablement, is lacking. Thus, the third document also does not provide an enabling system.

The three documents which make up the Zeanah provisional application, taken alone or in combination, fail to provide an enabling system. The provisional application's conceptual idea of "computer architecture to support global computer applications, including multiple languages and regional customizing" (title) is analogous to someone having the unresolved idea of a human travel to and from the nearest star. The provisional application's idea may have been noble, but the necessary details for making the system were not known or included in the provisional filing on October 31, 1996.

"A conception of an invention, though evidenced by disclosure, drawings, and even a model, is not a complete invention under the patent laws" (MPEP § 715.07; page 700-211, col. 1, August 2001). As previously shown, the Zeanah provisional application is merely a conceptual idea document. Under U.S. patent laws it cannot constitute a complete invention. Thus, because it is incomplete, it cannot be enabling.

Furthermore, it is respectfully submitted that the conceptual idea as disclosed in the provisional application of Zeanah does not meet the patent law definition of "conception" (MPEP

§ 2138.04). Conception requires the complete performance of the mental part of the inventive act and it is the formation in the mind of the inventor of a definite and permanent idea of the complete and operative invention as it is thereafter to be applied in practice. Conception requires the disclosure to be clear to enable one skilled in the art to reduce it to practice without undue experimentation or inventive skill. Conception is not complete if uncertainty undermines the specificity of the inventor's idea that it is not yet a definite and permanent reflection of the complete invention as it will be used in practice. As previously discussed, Zeanah's provisional application is neither complete nor operative, and it would require undue experimentation and further inventive skill. Thus, Zeanah's provisional application disclosure cannot constitute "conception."

Appellants have shown that Zeanah's provisional application does not constitute a "conception." Furthermore, even if it were somehow possible for the provisional application to meet the requirements of "conception", "conception is not enablement" (MPEP § 2138.04; page 2100-107, col. 1, August 2001). Nevertheless, Appellants have also shown that the provisional application does not meet the "enabling" requirements of the first paragraph of 35 U.S.C. § 112.

Therefore, the Zeanah patent is not entitled to the October 31, 1996 filing date of the non enabling provisional application. The Zeanah patent is, at best, only entitled to the August 7, 1997 filing date. The application that is the subject of this appeal claims the benefit of the November 27, 1996 filing date of provisional application 60/031,956. In conclusion, the Zeanah reference cannot constitute prior art against Appellants' invention.

### **The 35 U.S.C. § 103(a) Rejections**

Appellants traverse the rejections on the grounds that Appellants' claims recite features, relationships, and/or steps which are neither disclosed nor suggested in the prior art, and because there is no teaching, suggestion, or motivation cited so as to produce Appellants' invention. The features, relationships, and/or steps recited in Appellants' claims patentably distinguish over the applied reference. Nor would it have been obvious to one having ordinary skill in the art to have combined the reference's teachings to have produced the recited invention.

The Appellants respectfully disagree with the Action's interpretation of the references. Even if it were somehow possible (which it isn't) for the Action to show (which it doesn't) that all of the recited features were known in the prior art, it is still not proper to reject a claim on the basis of obviousness unless there is a specific teaching, suggestion, or motivation in the prior art to produce the claimed combination. *Panduit Corp. v. Denison Mfg. Co., supra. In re Newell, supra.* The Action does not provide any teaching, suggestion, or motivation in the prior art to modify the Zeanah reference. Thus, it would not have been obvious to one having ordinary skill in the art to have modified Zeanah to have produced Appellants' claimed invention.

Nor does the Action explain how Zeanah could be modified. Since the Action does not explain the rejections with reasonable specificity, it also procedurally fails to establish a *prima facie* case of obviousness. *Ex parte Blanc*, 13 USPQ2d 1383 (Bd. Pat. App. & Inter. 1989).

The Office does not factually support any *prima facie* conclusion of obviousness. To establish *prima facie* obviousness, the prior art must teach or suggest all the claim limitations. If the Office does not produce a *prima facie* case, then the Appellants are under no obligation to

submit evidence of nonobviousness (MPEP § 2142). The Office has not established a *prima facie* showing of obviousness. Thus, it is respectfully submitted that the 35 U.S.C. § 103(a) rejections are improper and should be withdrawn.

### **The Pending Claims Are Not Obvious Over Zeanah**

In the Action claims 1-22 and 33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zeanah. These rejections are respectfully traversed.

As previously discussed, Zeanah does not constitute prior art. Nevertheless, even if it were somehow possible for Zeanah to constitute prior art, it still would not have been obvious to have produced the claimed invention, as discussed in more detail herein.

#### **Claim 1**

The Appellants respectfully disagree with the Action's interpretation of Zeanah. The Action's cited sections of Zeanah do not teach or suggest the recited features and relationships. Zeanah does not teach or suggest an automated transaction machine including a computer, an input device, and a sheet dispenser in the manner recited. Nor does Zeanah teach or suggest software executable in the computer of the automated transaction machine, such that the software includes a first object operative to control the input device, and a second object operative to control the sheet dispenser, wherein the first object operates the input device and the second object operates the sheet dispenser responsive to transaction device instructions accessed at at least one HTTP address. Furthermore, Zeanah does not teach or suggest that the software further

includes a transaction data object, such that the transaction data object is in operative connection with the first object and second object and is operative to store therein data representative of both user inputs to the input device and the dispense of sheets by the dispenser.

Where does Zeanah teach or suggest software including a first object and a second object? Where does Zeanah specifically teach or suggest transaction device instructions? The Action is silent as to these recited features, especially a first software object that operates an input device and a second software object that operates a sheet dispenser, and further especially where both the first software object operates and the second software object operates responsive to transaction device instructions accessed at at least one HTTP address. Zeanah is concerned with a common delivery system, not with operating an input device and a sheet dispenser of automated transaction machine devices responsive to transaction device instructions accessed at an HTTP address. There is no evidence or suggestion in Zeanah of using HTTP address accessed instructions to operate transaction function devices. Where does Zeanah teach or suggest using an automated transaction machine computer to access transaction device instructions at an HTTP address, and operate an input device and a sheet dispenser with software objects in responsive to the accessed instructions? Where does Zeanah teach or suggest software objects that are responsive to transaction device instructions accessed by a computer at an HTTP address?

Furthermore, Zeanah does not teach or suggest that the software further includes a transaction data object, such that the transaction data object is in operative connection with the first object and second object and is operative to store therein data representative of both user inputs to the input device and the dispense of sheets by the dispenser. Where does Zeanah teach



or suggest using a transaction data software object that is operative to store therein data representative of both user inputs to the input device and the dispense of sheets by the dispenser? An exemplary embodiment of the invention involving a transaction data object (104) may be found at Specification page 26, lines 1-12, and shown schematically in Figure 9. Further support for a transaction data object may be found at Specification page 29, lines 18-19; page 40, lines 8-11; page 62, lines 10-12; page 63, lines 13-14; page 64, lines 5-15; page 65, lines 5-18; page 66, lines 1-2; and page 74, lines 9-12 and 20-21.

There is no link in Zeanah between an input device and operation of the input device responsive to a transaction device instruction accessed at an HTTP address. There is no link in Zeanah between a sheet dispenser and operation of the sheet dispenser responsive to a transaction device instruction accessed at an HTTP address. Nor is there any teaching, suggestion, or motivation in Zeanah to use a transaction data software object to store data representative of both a user input and sheet dispense.

Zeanah does not teach or suggest using automated transaction machine computer software to operate machine transaction devices responsive to instructions accessed at an HTTP address. Zeanah's sets (30, 40, 50, 60, 70, 80, 90, 100, 110, 120, 130) are all a part of the delivery system (12) (col. 1, lines 10-11; col. 6, lines 13-37). However, Zeanah's delivery system (12) does not include the remote devices (col. 5, lines 44-60; Figure 1). Zeanah's remote devices are remote from the delivery system (12) (Figure 1).

The Action is silent as to how Zeanah could be modified to include the recited features and relationships. It would not have been obvious to have modified Zeanah to have produced the

recited invention. The Action is devoid of any such teaching, suggestion, or motivation for combining features of the reference to have produced the recited invention.

The attempts to modify Zeanah are clearly attempts at hindsight reconstruction of Appellants' claimed invention, which is legally impermissible and does not constitute a valid basis for a finding of obviousness. *In re Fritch*, 22 USPQ2d 1780 (Fed. Cir. 1992). The rejection, which lacks the necessary evidence and rationale, is based on knowledge gleaned only from Appellants' disclosure.

The Office does not factually support any *prima facie* conclusion of obviousness. Zeanah does not disclose or suggest the recited features and relationships. Nor would it have been obvious to one having ordinary skill in the art to have modified Zeanah to have produced the recited invention. Thus, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection of claim 1 should be withdrawn.

### **Claim 2**

Zeanah does not disclose or suggest that a computer is operative to access an HTTP address through a software browser in the manner recited. Nor has the Office established a *prima facie* showing of obviousness.

### **Claim 3**

Claim 3 depends from claim 2. Zeanah does not disclose or suggest that at least one transaction device instruction is included in an HTML document, especially where software objects operate an input device and a sheet dispenser responsive to the at least one instruction. Where does Zeanah operate an input device and a sheet dispenser with software objects in

responsive to an HTML document? Nor would it have been obvious to have modified Zeanah to have produced the recited apparatus. The Office has not established a *prima facie* showing of obviousness.

#### **Claim 4**

Zeanah does not disclose or suggest a transaction data object including data representative of card data read by a card reader. Where does Zeanah disclose or suggest a transaction data software object is in operative connection with a first software object and a second software object, and that is operative to store therein data representative of both user inputs to an input device and the dispense of sheets by a dispenser, including data representative of card data read by a card reader? Nor would it have been obvious to have modified Zeanah to have produced the recited apparatus.

#### **Claim 5**

Zeanah does not disclose or suggest software including a third software object in operative connection with a transaction data object, especially where the third object is operative to access the data in the transaction data object. Where does Zeanah disclose or suggest a transaction data object in operative connection with a first, second, and third software object? Where does Zeanah disclose or suggest that a third software object is operative to access data in the transaction data object? Again, the Office has not established a *prima facie* showing of obviousness.

### **Claim 6**

Claim 6 depends from claim 5. Zeanah does not disclose or suggest a printer. Even the Action admits that "Zeanah et al. do not explicitly recite printing indicia" (Action page 4, last paragraph). It follows that Zeanah does not disclose or suggest that a (third) software object is operative to control a printer, especially where the (third) software object is operative to cause the printer to print data corresponding to data stored in the transaction data object (which is in operative connection with the first, second, and third software object).

Zeanah also does not disclose or suggest that the third software object is both operative to access data in the transaction data object and operative to cause the printer to print data corresponding to data stored in the transaction data object. Where does Zeanah disclose or suggest third software that is operative to access transaction data object data and cause the printer to print data corresponding to stored transaction data object data?

It would not have been obvious to have modified Zeanah to have produced the recited apparatus. Nor has the Office established a *prima facie* showing of obviousness.

### **Claim 7**

Zeanah does not disclose or suggest a computer that is operative to access first instructions at a first address, and a first object that is operative to control an input device responsive to the first instructions. Nor does Zeanah disclose or suggest that the computer is operative to access second instructions at a second address and a second object that is operative to control a sheet dispenser responsive to the second instructions. Where does Zeanah disclose

or suggest the relationships involving a computer, first address, first instructions, first object, input device, second address, second instructions, second object, and sheet dispenser.

Where does Zeanah disclose or suggest controlling an input device responsive to instructions accessed at a first address with a computer? Where does Zeanah disclose or suggest controlling a sheet dispenser responsive to instructions accessed at a second address with the computer? Zeanah does not disclose or suggest the recited features and relationships. It follows that the Office has not established a *prima facie* showing of obviousness.

#### **Claim 8**

Claim 8 depends from claim 7. It further follows that Zeanah does not disclose or suggest the computer being operative to access the first and second instructions through a browser. That is, Zeanah does not disclose or suggest a computer that is operative to access first instructions at a first address (with the browser) and a first software object that is operative to control an input device responsive to the first accessed instructions, nor that the computer is also operative to access second instructions at a second address (with the browser) and a second software object that is operative to control a sheet dispenser responsive to the accessed second instructions. Again, the Office has not established a *prima facie* showing of obviousness.

#### **Claim 9**

Zeanah does not disclose or suggest software that is operative to communicate at least a portion of the data stored in the transaction data object to a back office processing system. It follows that the Office has not established a *prima facie* showing of obviousness.

### **Claim 10**

Zeanah does not disclose or suggest transaction device instructions including an applet in the manner recited. Nor has the Office established a *prima facie* case of obviousness.

### **Claim 11**

Claim 11 is an independent method claim. Appellants' remarks in support of the patentability of claim 1 are incorporated by reference as if fully rewritten herein. Zeanah does not disclose or suggest operating an automated transaction machine device responsive to device operating instructions accessed at an HTTP address by a computer in the machine. Where does Zeanah specifically teach or suggest operating an automated transaction machine device responsive to device operating instructions accessed by a computer in the machine at an HTTP address? Furthermore, Zeanah does not disclose or suggest storing data, generated with an automated transaction machine device responsive to operation of the device, in a transaction data object in a memory in operative connection with the computer. Where does Zeanah specifically teach or suggest generating data with an automated transaction machine device, responsive to operation of the device? Where does Zeanah specifically teach or suggest storing device generated data in a transaction data object in a memory in operative connection with the computer?

The Office bears the burden of establishing that all the recited features of the claim are known in the prior art. Appellants respectfully submit that the Office has not met this burden.

Additionally, the Action is silent as to how Zeanah could be modified to include the recited features, relationships, and steps. It would not have been obvious to one having ordinary

skill in the art to have modified Zeanah to have produced the recited invention. The Action is devoid of any such teaching, suggestion, or motivation for combining features of the reference to have produced the recited invention.

Furthermore, attempts to modify Zeanah constitute attempts at hindsight reconstruction of Appellants' claimed invention, which is legally impermissible and does not constitute a valid basis for a finding of obviousness. *In re Fritch*, supra. The rejection, which lacks the necessary evidence and rationale, is based on knowledge gleaned only from Appellants' disclosure.

The Office does not factually support any *prima facie* conclusion of obviousness. Zeanah does not disclose or suggest the recited features, relationships, and steps. Nor would it have been obvious to one having ordinary skill in the art to have modified Zeanah to have produced the recited invention. Thus, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection of claim 11 should be withdrawn.

#### **Claim 12**

Zeanah does not disclose or suggest that data representative of a dispense of a sheet by an automated transaction machine sheet dispenser is stored in a transaction data object, especially where operation of the sheet dispenser is responsive to operating instructions accessed at an HTTP address. It follows that the Office has not established a *prima facie* showing of obviousness.

#### **Claim 13**

Zeanah does not disclose or suggest operating an automated transaction machine first device responsive to first device operating instructions accessed at a first HTTP address;

operating an automated transaction machine second device responsive to second device operating instructions accessed at a second HTTP address; and storing first data and second data, generated with the first device and the second device responsive to respective operation thereof, in a transaction data object. Where does Zeanah specifically teach or suggest storing automated transaction machine first device generated first data and automated transaction machine second device generated second data in the same transaction data object? The Office has not established *prima facie* obviousness.

#### **Claim 14**

The Appellants respectfully submit that claim 14 has an obvious typographical error. The claim number should read 14 instead of 13. That is, claim 14 depends from claim 13. The Action acknowledges that claims 1-33, including claim 14, are pending. The Office is hereby authorized to correct the typographical error on behalf of Appellants by Examiner's amendment.

Zeanah does not disclose or suggest storing both card data and keyboard input data, respectively generated with a card reader and a keyboard, in a transaction data object. It follows that the Office has not established a *prima facie* showing of obviousness.

#### **Claim 15**

Zeanah does not disclose or suggest accessing data (generated with an automated transaction machine first device) stored in a transaction data object with a software object, and controlling a second device in an automated transaction machine responsive to the software object and the data in the transaction data object. Nor does the Office establish a *prima facie* case of obviousness.



### **Claim 16**

Claim 16 depends from claim 15. Zeanah does not disclose or suggest accessing data (generated with an automated transaction machine first device) stored in a transaction data object with a software object, and controlling an automated transaction machine printer in responsive to a software object and data in a transaction data object, where the printer is operative to print indicia corresponding to data in the transaction data object. *Prima facie* obviousness has not been established.

### **Claim 17**

Zeanah does not disclose or suggest operating an automated transaction machine device responsive to device operating instructions accessed at an HTTP address by a browser in the machine. It follows that the Office has not established a case of *prima facie* obviousness.

### **Claim 18**

Claim 18 is an independent method claim. Appellants' remarks in support of the patentability of claim 11 are incorporated by reference as if fully rewritten herein. Zeanah does not disclose or suggest storing identifying data in a transaction data object in software operating in a first computer in operative connection with an automated banking machine. Nor does Zeanah disclose or suggest conducting a transaction responsive to user input, including accessing the stored identifying data in the transaction data object. Where does Zeanah disclose or suggest accessing identifying data in a transaction data object in conducting a transaction? Zeanah also does not disclose or suggest storing data corresponding to operation of a transaction function

device in the transaction data object. Where does Zeanah disclose or suggest storing identifying data and transaction function device operation data in a transaction data object?

The Office has not met the burden of establishing that all the recited features of the claim are known in the prior art. The evidence of record must teach or suggest the recited features to be a valid basis for rejecting the claim. *In re Zurko*, supra. Additionally, the Action is silent as to how Zeanah could be modified to include the recited features, relationships, and steps. Nor would it have been obvious to one having ordinary skill in the art to have modified Zeanah to have produced the recited invention. The Action is devoid of any such teaching, suggestion, or motivation for combining features of the reference to have produced the recited invention. Thus, a *prima facie* case of obviousness has not been established.

Furthermore, attempts at modification of Zeanah are attempts at hindsight reconstruction of the recited invention, which is legally impermissible and does not constitute a valid basis for a finding of obviousness. *In re Fritch*, supra. The rejection lacks the necessary evidence and rationale. The rejection is based on knowledge gleaned only from Appellants' disclosure.

Zeanah does not disclose or suggest the recited features, relationships, and steps. Nor does the Office factually support any *prima facie* conclusion of obviousness. Nor would it have been obvious to one having ordinary skill in the art to have modified Zeanah to have produced the recited invention. Thus, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection of claim 18 should be withdrawn.

### **Claim 19**

Zeanah does not disclose or suggest storing both identifying data and currency note dispenser operation data in a transaction data object in software. Additionally, the Action (e.g., in the rejection of claim 26) relies on a secondary reference for storing data (generated responsive to operation of a currency note dispenser) in a transaction data object. Thus, the Office has not established a *prima facie* case of obviousness.

### **Claim 20**

Zeanah does not disclose or suggest conducting both a first transaction and a second transaction by accessing data in a transaction data object in software. Nor would it have been obvious to one having ordinary skill in the art to have modified Zeanah to have produced the recited invention.

### **Claim 21**

Zeanah does not disclose or suggest accounting for the first transaction by the user, including passing the transaction data object from the first computer. Where does Zeanah teach or suggest accounting for a user transaction by passing a transaction data object in software from a computer? Again, the Office has not established a *prima facie* showing of obviousness.

### **Claim 22**

Zeanah does not disclose or suggest accessing data in a transaction data object and producing indicia in a printed record corresponding to at least a portion of the data stored in the transaction data object. There is no evidence of record that Zeanah teaches or suggests producing indicia. Even the Action admits (page 4, last paragraph) that Zeanah does not recite printing

indicia. However, the evidence of record must teach or suggest the recited features to present a valid rejection. *In re Zurko*, supra. It follows that the Office has not established a *prima facie* case of obviousness.

### **Claim 33**

Claim 33 is an independent apparatus claim. Appellants' remarks in support of the patentability of claim 1 are incorporated by reference as if fully rewritten herein.

Zeanah does not disclose or suggest the recited automated transaction machine. Zeanah does not disclose or suggest a transaction data object, where the transaction data object is stored in a memory as data in an object in software, where the transaction data object is adapted to hold data representative of a transaction involving an automated transaction machine, where the transaction data object is adapted to accumulate data as the transaction proceeds, and where the transaction data in the transaction data object includes sharable transaction data accessible in a number of different transaction operations. Where does Zeanah teach or suggest a transaction data object including sharable transaction data, especially where the transaction data object is stored in a memory as data in an object in software? As previously discussed, Zeanah does not teach or suggest a transaction data object stored in software. Where does Zeanah teach or suggest that the recited transaction data object (stored in a memory as data in an object in software) is adapted to accumulate data as a transaction proceeds? The Action is silent as to Zeanah teaching or suggesting a transaction data object in the manner recited. Nor does Zeanah teach or suggest the recited transaction data object.

Zeanah also does not disclose or suggest a computer that is adapted to operate, responsive to at least one received mark up language document, to cause a currency note to be dispensed.

Where does Zeanah teach or suggest dispensing a currency note responsive to a mark up language document? Nor does Zeanah disclose or suggest that a computer is operative to access transaction data in a transaction data object in conducting a transaction. Nor does Zeanah disclose or suggest that the computer is also operative to store in the transaction data object transaction data representative of the dispense of the currency note. Where does Zeanah teach or suggest both accessing data in a transaction data object in conducting a transaction and storing in the transaction data object data representative of the transaction, especially where the transaction involves dispensing a currency note responsive to a mark up language document?

There is no link in Zeanah between dispensing a currency note and a mark up language document. Nor is there any teaching, suggestion, or motivation in Zeanah to use a transaction data software object to store data representative of the currency note dispense, especially a transaction data software object including sharable transaction data.

The Office has not met the burden of establishing that all the recited features of the claim are known in the prior art. The evidence of record must teach or suggest the recited features to present a valid rejection. *In re Zurko*, supra. Furthermore, the Action is silent as to how Zeanah could be modified to include the recited features and relationships. Nor would it have been obvious to have modified Zeanah to have produced the recited invention. The Action is devoid of any such teaching, suggestion, or motivation for combining features of the reference to have produced the recited invention.

The attempts to modify Zeanah are attempts at hindsight reconstruction based on knowledge gleaned only from Appellants' disclosure. The Office does not factually support any *prima facie* conclusion of obviousness. Zeanah does not disclose or suggest the recited features and relationships. Nor would it have been obvious to one having ordinary skill in the art to have modified Zeanah to have produced the recited invention. Thus, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection of claim 33 should be withdrawn.

**The Pending Claims Are Not Obvious Over  
Zeanah in view of Wynn**

In the Action claims 23-32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zeanah in view of Wynn.

As previously discussed, Zeanah does not constitute prior art. Nevertheless, even if it were somehow possible for Zeanah to constitute prior art, it still would not have been obvious to one having ordinary skill in the art to have modified Zeanah with the teachings of Wynn to have produced the claimed invention, as discussed in more detail herein. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests the recited features and relationships.

**Claim 23**

Claim 23 depends from claim 11. Zeanah does not disclose or suggest conducting a transaction responsive to a user input, including accessing identifying data in a transaction data object in software operating in an automated transaction machine computer. Where does Zeanah teach or suggest storing identifying data in a transaction data object in software operating in a

computer? Where does Zeanah teach or suggest conducting a transaction involving accessing user identifying data in a transaction data software object?

Wynn is directed to a card for compiling and storing financial transaction records pertaining to plural financial accounts. Wynn is not directed to using a transaction data object in software operating in a computer. Thus, Wynn does not disclose or suggest the recited features which are not found in Zeanah.

Furthermore, the Action is also silent as to how the structure of Zeanah could be modified by the teaching of Wynn to include the recited features and relationships. The alleged modification to Zeanah would destroy the disclosed and desired utility or operability of the Zeanah teaching. An obviousness rejection cannot be based on a combination of features if making the combination would result in destroying the utility or advantage of the device shown in the prior art reference. Note *In re Fine*, 5 USPQ2d 1598-99 (Fed. Cir. 1988). Therefore, it would not have been obvious to have modified Zeanah with the system of Wynn as alleged to have produced the recited invention.

Appellants respectfully submit that the Office does not factually support any *prima facie* conclusion of obviousness. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests the features, relationships, and steps that are specifically recited. Nor is there any teaching, suggestion, or motivation cited for combining features of these references so as to produce the claimed invention. It would not have been obvious to one having ordinary skill in the art to have modified Zeanah with the teachings of Wynn to have produced the claimed invention.

#### **Claim 24**

Claim 24 depends from claim 11. The Action alleges that a smart card in Zeanah constitutes a hand held device. The Appellants respectfully disagree. Nevertheless, neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests transferring data object data between a hand held device and an automated transaction machine. Wynn does not teach transferring data object data. Furthermore, Wynn's card does not communicate with an automated transaction machine. Thus, it would not have been obvious to have modified Zeanah with the teachings of Wynn to have produced the claimed invention.

#### **Claim 25**

Claim 25 depends from claim 24. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests transferring data object data between a hand held device (comprising a processor) and an automated transaction machine. Nor has the Office presented a *prima facie* showing of obviousness.

#### **Claim 26**

Claim 26 depends from claim 11. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests storing data (generated responsive to operation of a currency note dispenser) in a transaction data object. Nor has the Office established a *prima facie* case of obviousness.

#### **Claim 27**

Claim 27 depends from claim 1. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests a hand held device operative to transfer data object data from



or to an automated transaction machine, especially where software includes the transaction data object, and the transaction data object is in operative connection with a first object and a second object and is operative to store therein data representative of both user inputs to an input device and the dispense of sheets by a dispenser.

**Claim 28**

Claim 28 depends from claim 27. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests a hand held device (comprising a processor) operative to transfer data object data from or to an automated transaction machine. The Office has not presented a *prima facie* showing of obviousness.

**Claim 29**

Claim 29 depends from claim 1. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests a software object that operates a currency note dispenser, especially where the software object operates responsive to transaction device instructions accessed at at least one HTTP address. There is no link in Zeanah or Wynn between a currency note dispenser and the operation of the currency note dispenser responsive to a transaction device instruction accessed at an HTTP address. Nor is there any teaching, suggestion, or motivation in the references to use a transaction data software object to store data representative of a currency note dispense. Nor has the Office established a *prima facie* showing of obviousness.

**Claim 30**

Claim 30 is an independent apparatus claim. Appellants' remarks in support of the patentability of claims 1 and 33 are incorporated by reference as if fully rewritten herein.

Neither Zeanah nor Wynn, taken alone or in combination, disclose or suggest an automated transaction machine computer adapted to operate responsive to at least one mark up language document to cause at least one sheet to be dispensed from the machine. Where does either reference teach or suggest dispensing a sheet responsive to a mark up language document? Nor does Zeanah or Wynn, taken alone or in combination, disclose or suggest that an automated transaction machine computer is also operative to store in a memory data representative of the sheet dispense. Where does either reference teach or suggest storing data representative of a sheet dispense in a memory, especially where the sheet dispense is responsive to a mark up language document?

The Action is silent as to how the structure of Zeanah could be modified by the teaching of Wynn to include the recited features and relationships. The alleged modification to Zeanah would destroy the disclosed and desired utility or operability of the Zeanah teaching. An obviousness rejection cannot be based on a combination of features if making the combination would result in destroying the utility or advantage of the device shown in the prior art reference. *In re Fine*, supra.

The Office does not factually support any *prima facie* conclusion of obviousness. The attempts to modify Zeanah are attempts at hindsight reconstruction based on knowledge gleaned only from Appellants' disclosure. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests the features and relationships specifically recited in claim 30. Nor is there any teaching, suggestion, or motivation cited for combining features of these references so as to produce the claimed invention. It would not have been obvious to one having ordinary skill in

the art to have modified Zeanah with the teachings of Wynn to have produced the claimed invention. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn.

#### **Claim 31**

Claim 31 depends from claim 30. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests a transaction data object operative to store therein data representative of the dispense of at least one sheet. Where does either reference teach or suggest storing sheet dispense data in a transaction data object? The Office has not established a *prima facie* showing of obviousness.

#### **Claim 32**

Claim 32 depends from claim 30. Neither Zeanah nor Wynn, taken alone or in combination, discloses or suggests a computer that is adapted to operate, responsive to at least one mark up language document, to cause a currency note to be dispensed. Nor does Zeanah or Wynn, taken alone or in combination, disclose or suggest that the computer is also operative to store in a memory data representative of a currency note dispense. Nor has the Office established a *prima facie* showing of obviousness.

### **CONCLUSION**

Each of Appellants' pending claims specifically recites features, relationships, and/or steps that are neither disclosed nor suggested in any of the applied art. Furthermore, the applied art is devoid of any teaching, suggestion, or motivation for combining features of the applied art

so as to produce the recited invention. For these reasons it is respectfully submitted that all the pending claims are allowable.

Respectfully submitted,



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## APPENDIX

### CLAIMS

1. Apparatus comprising:

an automated transaction machine including:

a computer, the computer in operative connection with a memory;

an input device in operative connection with the computer, wherein the input device is operative to accept user inputs;

a sheet dispenser in operative connection with the computer, wherein the sheet dispenser is operative to dispense sheets;

software executable in the computer, wherein the software includes a first object operative to control the input device, and a second object which is operative to control the sheet dispenser, wherein the computer is operative to access at least one HTTP address, wherein transaction device instructions are accessible at the address, and wherein the first object operates the input device and the second object operates the sheet dispenser responsive to the instructions, and wherein the

software further includes a transaction data object, wherein the transaction data object is in operative connection with the first object and second object and is operative to store therein data representative of both user inputs to the input device and the dispense of sheets by the dispenser.

2. The apparatus according to claim 1 wherein the software includes a browser and wherein the computer is operative to access the address through the browser.
3. The apparatus according to claim 2 wherein at least one transaction device instruction is included in an HTML document.
4. The apparatus according to claim 1 wherein the input device includes a card reader, and wherein the transaction data object includes data representative of card data read by the card reader.
5. The apparatus according to claim 1 wherein the software further includes a third object in operative connection with the transaction data object, and wherein the third object is operative to access the data in the transaction data object.
6. The apparatus according to claim 5 wherein the machine further includes a printer, and wherein the third object is operative to control the printer, and wherein the third object is

operative to cause the printer to print data corresponding to data stored in the transaction data object.

7. The apparatus according to claim 1 and further comprising at least one HTTP server, wherein the HTTP address corresponds to the server, wherein a plurality of transaction device instructions are accessible through the server, wherein first instructions are accessible at a first address and second instructions are accessible at a second address and wherein the computer is operative to access the first instructions at the first address and the first object is operative to control the input device responsive to the first instructions, and wherein the computer is operative to access the second instructions at the second address and the second object is operative to control the sheet dispenser responsive to the second instructions.

8. The apparatus according to claim 7 wherein the software further comprises a browser, and wherein the computer is operative to access the first and second instructions through the browser.

9. The apparatus according to claim 1 and further comprising a back office processing system in operative connection with the computer, and wherein the software is operative to communicate at least a portion of the data stored in the transaction data object to the back office processing system.

10. The apparatus according to claim 1 wherein the transaction device instructions include an applet.

11. A method comprising the steps of:

(a) operating a first device in an automated transaction machine responsive to first device operating instructions accessed by a computer in the machine at a first HTTP address;

(b) generating first data with the first device, responsive to operation of the first device; and

(c) storing the first data in a transaction data object in a memory in operative connection with the computer.

12. The method according to claim 11 wherein the first device is a sheet dispenser and the first data is representative of a dispense of at least one sheet by the sheet dispenser.

13. The method according to claim 11 and further comprising the steps of:



(d) operating a second device in the machine responsive to second device operating instructions accessed by the computer at a second HTTP address;

(e) generating second data with the second device, responsive to operation of the second device; and

(f) storing the second data in the transaction data object.

13. The method according to claim 13 wherein the first device includes a card reader and the second device includes a keyboard, and wherein the first data includes data representative of card data read from a card and the second data includes data representative of an input to the keyboard.

15. The method according to claim 11 and further comprising the steps of:

(d) accessing the data included in the transaction data object with a software object operative in the computer; and

(e) controlling a second device in the machine with the computer responsive to the object and the data in the transaction data object.

16. The method according to claim 15 wherein in step (e) the second device includes a printer, and wherein in step (e) the printer is operative to print indicia corresponding to data in the transaction data object.

17. The method according to claim 11 wherein the computer includes a browser and wherein step (a) comprises accessing the first address with the browser.

18. A method comprising:

(a) accepting identifying data from a user of an automated banking machine;

(b) storing data corresponding to the identifying data in a transaction data object in software operating in a first computer in operative connection with the machine;

(c) conducting a first transaction responsive to at least one user input to the machine, wherein conducting the first transaction includes accessing the data in the transaction data object;

(d) storing data corresponding to operation of a transaction function device in the transaction data object.

19. The method according to claim 18 wherein the transaction function device comprises a currency note dispenser, and (d) includes storing data corresponding to operation of the currency note dispenser in the transaction data object.

20. The method according to claim 18 and further comprising:

(e) conducting a second transaction responsive to at least one user input to the machine, wherein conducting the second transaction includes accessing the data in the transaction data object.

21. The method according to claim 18 and further comprising:

(e) accounting for the first transaction by the user, including passing the transaction data object from the first computer.

22. The method according to claim 18 and further comprising:

(e) producing a printed record corresponding to the first transaction with the machine, including accessing the data in the transaction data object and producing indicia in the printed record corresponding to at least a portion of the data stored in the transaction data object.

23. The method according to claim 11

wherein the step of operating includes accepting identifying data from a user of an automated banking machine;

wherein the step of storing includes storing data corresponding to the identifying data in the transaction data object in software operating in the computer; and further comprising

(d) conducting a first transaction responsive to a user input to the machine, wherein conducting the first transaction includes accessing the data corresponding to the identifying data in the transaction data object.

24. The method according to claim 11 and further comprising

(d) transferring data object data between a hand held device and the machine.

25. The method according to claim 24 wherein the hand held device comprises a processor.

26. The method according to claim 11 wherein the first device comprises a currency note dispenser.

27. The apparatus according to claim 1 further including a hand held device, wherein the hand held device is operative to transfer data object data from or to the machine.

28. The apparatus according to claim 27 wherein the hand held device comprises a processor.

29. The apparatus according to claim 1 wherein the sheet dispenser comprises a currency note dispenser, and wherein the currency note dispenser is operative to dispense currency notes.

30. Apparatus comprising:

an automated transaction machine including:

a sheet dispenser mechanism, wherein the sheet dispenser mechanism is adapted to selectively dispense sheets from the machine;

a computer in operative connection with the sheet dispenser mechanism, wherein the computer is adapted to receive mark up language documents, wherein the computer is adapted to operate responsive to at least one mark up language document to cause at least one sheet to be dispensed from the machine, and wherein the computer is operative to store in a memory data representative of the dispense of the at least one sheet.

31. The apparatus according to claim 30 further including a transaction data object, wherein the memory comprises the transaction data object, and wherein the transaction data object is operative to store therein data representative of the dispense of the at least one sheet.

32. The apparatus according to claim 30 wherein the sheet dispenser mechanism comprises a currency note dispenser mechanism, and wherein the computer is adapted to operate responsive to the at least one mark up language document to cause at least one currency note to be dispensed from the machine.

33. Apparatus comprising:

an automated transaction machine including:

a currency note dispenser mechanism, wherein the dispenser mechanism is adapted to selectively dispense currency notes from the machine,

a transaction data object, wherein the transaction data object is stored in a memory as data in an object in software, wherein the transaction data object is adapted to hold data representative of a transaction involving the automated transaction machine, wherein the transaction data object is adapted to accumulate data as the transaction proceeds, and wherein the transaction data in the transaction data object includes sharable transaction data accessible in a number of different transaction operations,

a computer in operative connection with the dispenser mechanism, wherein the computer is adapted to receive mark up language documents, wherein the computer is adapted to operate responsive to at least one mark up language document to cause at least one currency note to be dispensed from the machine, wherein the computer is operative to access the transaction data in the transaction data object in conducting the transaction, and wherein the computer is operative to store in the transaction data object transaction data representative of the dispense of the at least one currency note.